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19 Attorneys for Defendant EQUIFAX
20 INFORMATION SERVICES LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself)
and other similarly situated people,)

Plaintiff,)

v.)

CREDIT CONSULTING SERVICES, INC.,)
dba CCS, EQUIFAX CREDIT)
INFORMATION SERVICES, LLC,)
EXPERIAN INFORMATION SOLUTIONS,)
INC., TRANS UNION LLC and DOES 1-50,)
inclusive,)

Defendants.)

Case No. 5:08-CV-01317-JF

**REQUEST OF DEFENDANT EQUIFAX
INFORMATION SERVICES LLC TO
APPEAR TELEPHONICALLY AT THE
HEARING ON DEFENDANT TRANS
UNION LLC'S MOTION TO COMPEL;
DECLARATION OF LEWIS P. PERLING
IN SUPPORT THEREOF;
[PROPOSED] ORDER**

**Hearing: June 17, 2008
Time: 10:00 a.m.
Courtroom: 2**

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**REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY AT HEARING
ON MOTION TO COMPEL; DECLARATION OF LEWIS P. PERLING**

Case No. 5:08-cv-01317-JF

1 COMES NOW Defendant Equifax Information Services LLC (“Equifax”), incorrectly
2 sued herein as “Equifax Credit Information Services LLC,” and respectfully requests to appear
3 telephonically at the hearing on Defendant Trans Union’s Motion to Compel Production of
4 Documents currently set for hearing on June 17, 2008, at 10:00 a.m. before the Honorable
5 Howard R. Lloyd.

6 Good cause exists to grant this request because counsel for Equifax would be required to
7 travel from Atlanta, Georgia and/or Laguna Beach, California to San Jose, California, such that
8 Equifax will incur significant travel costs and attorney’s fees at a time when Equifax is
9 attempting to minimize the cost of litigation in this and numerous other matters.

10 Counsel for Equifax believes the objectives of this hearing will be accomplished if
11 Equifax appears by telephone. Equifax is neither the movant nor the respondent on the motion
12 and, therefore, does not anticipate presenting any argument at the hearing. Both movant’s
13 counsel and respondent’s counsel have similarly requested telephonic appearance.

14 NOKES & QUINN

15
16 Dated: June 9, 2008

17 /s/
18 THOMAS P. QUINN, JR.

19 BARRY GOHEEN
20 LEWIS P. PERLING
21 KING & SPALDING LLP

22 Attorneys for Defendant EQUIFAX
23 INFORMATION SERVICES, LLC
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REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY AT HEARING
ON MOTION TO COMPEL; DECLARATION OF LEWIS P. PERLING

Case No. 5:08-cv-01317-JF

DECLARATION OF LEWIS P. PERLING

I, Lewis P. Perling, hereby declare:

1. I am admitted to practice *pro hac vice* in this case before this Court and am associated with King & Spalding LLP, counsel for Defendant Equifax Information Services LLC (“Equifax”) in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. My office is located in Atlanta, Georgia. A personal appearance at the hearing on Trans Union’s Motion to Compel Production of Documents scheduled for June 17, 2008, would require me, and/or my co-counsel Barry Goheen also of King & Spalding in Atlanta or Thomas P. Quinn of Nokes & Quinn of Laguna Beach, California, to travel by plane to San Jose, California and potentially seek accommodations the evening before. This will cause Equifax to incur significant attorneys’ fees and costs for travel time and expenses at a time when Equifax has requested that we minimize the cost of litigation in this and other matters through, among other things, requesting telephonic court appearances whenever possible.

Equifax is neither the movant nor the respondent on the motion and, therefore, does not anticipate presenting any argument at the hearing. Both movant’s counsel and respondent’s counsel have similarly requested telephonic appearance. Further, we will be attending a hearing in this Court three days later, on June 20, 2008 and wish to avoid incurring the cost of travel to San Jose twice on this matter in the same week.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of June, 2008.

/s/

LEWIS P. PERLING

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REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY AT HEARING
ON MOTION TO COMPEL; DECLARATION OF LEWIS P. PERLING

Case No. 5:08-cv-01317-JF

CERTIFICATE OF SERVICE

CARVALHO v EQUIFAX, et al, CASE NO: 5:08-CV-01317-JF

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On June 9, 2008. I served a true copy of the

REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY; DECLARATION OF
LEWIS P. PERLING IN SUPPORT THEREOF; [PROPOSED] ORDER

[X] By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

Ron Keith Bochner
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I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury that the foregoing is true and correct.

/s/
YVONNE M. HOMAN

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REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY AT HEARING
ON MOTION TO COMPEL; DECLARATION OF LEWIS P. PERLING

Case No. 5:08-cv-01317-JF